

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JAMES E. SHELTON, individually and on behalf of all others similarly situated, : Civil File No. 1:24-cv-01429-KAM-JAM

Plaintiff, :
v. :
HEAVY FLUCE INC., D/B/A FLUCE AI :
Defendant. :
: COMPLAINT – CLASS ACTION

Kindly enter my appearance as attorney for Plaintiff in the above-captioned matter.

RESPECTFULLY SUBMITTED AND DATED this April 19, 2024.

/s/ Andrew Roman Perrong
Andrew Roman Perrong (*Pro Hac Vice*)
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

April 19, 2024

/s/ Andrew Roman Perrong